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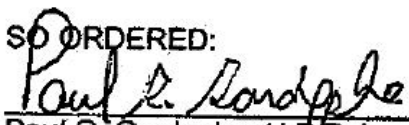
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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

July 17, 2021

Dated: July 19, 2021

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil D. Isaza Tuzman. First, he would like to convey his gratitude to the Court for permitting him to visit with his family in Massachusetts and New Hampshire in April. Second, he respectfully requests leave to travel to Vermont and Massachusetts from July 24 through 27, 2021, in order to visit with his daughter and immediate family.

Mr. Isaza Tuzman's daughter lives overseas and is rarely able to visit the United States. The last time Mr. Isaza Tuzman has been able to see his daughter in person was before the pandemic. This trip has been organized so that Mr. Isaza Tuzman can see his daughter and his immediate family prior to his sentencing on July 30, 2021.

If this leave request is approved, Mr. Isaza Tuzman would stay with his daughter at 124 Elm Street, Bennington, VT, and visit during the day on July 27 with his family in Western Massachusetts. He would return to the Southern District of New York on the evening of Tuesday, July 27. All other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

This request has been communicated to Pretrial Services, which responded as follows: "As per our office policy, our office objects to out-of-district multi-day travel requests. This objection is general and not specific to Mr. Isaza Tuzman, who has remained compliant with supervision and has traveled without incident many times in the past. If this leave request is approved, we will enter it into the schedule."

Mr. Isaza Tuzman has previously traveled to Colorado, Louisiana, Massachusetts, New Hampshire and Pennsylvania for religious holiday observance and family gatherings, with the Court's permission. *See, e.g.*, ECF Nos. 125, 441, 758, 930, 952, 1033, 1089, 1104,

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1110, 1144. In these cases and every other time Mr. Isaza Tuzman has traveled outside this District as permitted by the Court, he has left and returned without incident.

We have reached out to the government to obtain the prosecutors' position on this request, and have received no response. We note that the government has objected to all prior requests to travel out-of-district.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)